

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

**KIMBERLY D. POLLARD and
J.S. (MINOR CHILD),**

Plaintiffs,

v.

**CHURCH OF GOD IN CHRIST, INC.;
CHURCH OF GOD IN CHRIST,
BOARD OF BISHOPS; and BISHOP
JAMES L'KEITH JONES**

Defendants.

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Case No. 2:16-cv-000238-J

**CHURCH OF GOD IN CHRIST, INC.'S
MOTION FOR FINAL SUMMARY JUDGMENT ON
KIMBERLY POLLARD'S CLAIMS**

Defendant, Church of God in Christ, Inc. (the National Church), pursuant to Federal Rule of Civil Procedure 56, respectfully moves this Court for entry of an Order granting final summary judgment in its favor.

In support of this Motion, the National Church is filing a Brief including the relevant Argument and Authorities. In accordance with Local Rule 56.3(b), each of the matters required by Local Rule 56.3(a) is set forth in the supporting Brief.

For the reasons provided in the supporting Brief, the National Church contends that Ms. Pollard's claims related to any conduct occurring before October 31, 2011 are barred by the statute of limitations. Ms. Pollard's claims do not involve "extreme and outrageous" conduct. Ms. Pollard's claims for vicarious liability against the National Church fail as a matter of law, and Ms. Pollard's negligent supervision claim (which is her only direct liability claim against the National Church) also fails as a matter of law.

Respectfully submitted,

By: /s/Justin L. Jeter

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**ATTORNEY FOR THE NATIONAL
CHURCH**

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been filed with the Clerk of Court on August 18, 2017, using the CM/ECF system and was served on the following:

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